

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER GEORGE PABLE,

Plaintiff,

v.

CHICAGO TRANSIT AUTHORITY and
CLEVER DEVICES LTD.,

Defendants.

Case No. 19-cv-7868

Judge Elaine E. Bucklo

CHICAGO TRANSIT AUTHORITY,

Counter-Plaintiff,

v.

CHRISTOPHER GEORGE PABLE,

Counter-Defendant.

**CHICAGO TRANSIT AUTHORITY’S MOTION FOR LEAVE TO FILE ITS MOTION
TO COMPEL PLAINTIFF’S DISCOVERY RESPONSES IN EXCESS OF 15 PAGES**

Defendant, Chicago Transit Authority (“Defendant”), by its undersigned counsel and pursuant to Local Rule 7.1, hereby files this Motion for Leave to File its Motion to Compel Plaintiff’s Responses to Discovery in Excess of 15 Pages, and in support thereof, states as follows:

1. Plaintiff has failed to fulfill his discovery obligations in this matter and provide responses to discovery issued by CTA.

2. In order for the CTA to fully address the procedural background and the deficiencies in Plaintiff’s discovery, the CTA requires a motion to compel of 20 pages, excluding

the table of contents and table of cases required by Local 7.1. A copy of the CTA's proposed Motion to Compel is attached hereto as Exhibit 1.

WHEREFORE, the CTA respectfully requests leave to file its Motion to Compel Plaintiff's Discovery Responses in Excess of 15 Pages.

Dated: December 9, 2020

Respectfully submitted,

CHICAGO TRANSIT AUTHORITY

By: s/ Elizabeth E. Babbitt
One of Its Attorneys

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